

In the matter of Morse Code requirements for Amateur Licenses (see RM-10805, RM-10806, RM-10808), I would like to make the following recommendations.

- 1) Eliminate the Morse Code requirement for all Technician Class licensees. This would eliminate the need to enforce the difficult “Technician” / “Technician-Plus” designations which are not recognized anymore. In addition, this adds an additional band, which may entice more applicants and allow expanded access for current “No Code Tech’s”. This is also more in line with entry-level Amateur communications and public safety/service operations.
- 2) Maintain the 5 words per minute requirement for General Class requirements. By eliminating code here, it may simply adjust enforcement matters currently associated with Technician Plus licensees to a conceivable “General Plus” type licensee. There is another reason I will mention below.
- 3) Increase the requirement for Extra Class to 10 words per minute. This increases the requirement to obtain Extra Class from a single test for both General & Extra to two separate tests.

Although Morse Code is not used in daily applications as it once was, the technical merit and tradition of the mode is vital to radio operation. It is still a viable means of communications like voice and data and therefore in it’s existence alone, should be known. It is also rich in historical value and should not be forgotten.

By increasing the extra requirement to 10WPM, it makes obtaining an Extra Class license that much more special. Like in most any field, higher certification indicates a strong educational ethic. Not to say that those obtaining a General over a Technician, or Extra or General are “Elitists” or should act superior. But they truly have gone the extra (no pun intended) mile to gain the highest level of certification available. Currently, I don’t think that extra step completely exists by having the code requirement for General & Extra be the same.

As with any change, existing licensees would maintain their current level and privileges. The only exception to this being the Technician No Code privileges extending into the 10-Meter band.

Thank you for taking the time to review the comments on this matter.

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